

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ESJ, ppa LUCKY GIRL (Lisa) BEH and ELLIOTT)	
SACKOR, SR., and LUCKY GIRL (Lisa) BEH and)	
ELLIOTT SACKOR, SR., Individually,)	
Plaintiffs,)	
v.)	No. 18-cv-956-SM
UNITED STATES OF AMERICA,)	
MARY CULLEN, D.O., and)	
ELLIOT HOSPITAL,)	
Defendants.)	
_____)	

AMENDED¹ JOINT MOTION TO EXTEND REMAINING DEADLINES AND TRIAL

Pursuant to Local Rule 7.2(a) of the Local Rules of this Court, the parties respectfully request that the Court extend the remaining deadlines in this matter, as well as the trial date, for a period of five months. In support of this Motion, the parties state as follows:

1. Plaintiffs have recently disclosed their expert witnesses, and the parties have discussed the scheduling of the depositions of Plaintiffs' expert witnesses, but the depositions have not occurred. Once the depositions of the expert witnesses have taken place, the parties will be in a better position of assessing the likelihood of settlement. Given the uncertainty of when the expert witness depositions will occur, however, the parties propose that the current deadlines be extended for five months.

¹The Parties filed an assented-to motion with the Court (McAuliffe, J.) to extend the remaining deadlines and trial on August 6, 2021. See Document Number ("DN") 34. After filing the motion, the Parties received a notification from the Court that DN 34 filed to comply with Local Rule ("LR") 7.2, in that it failed to contain a certification that the parties' clients had been notified of the motion. Accordingly, this pleading, which contains the Parties' LR 7.2 certification, is intended to replace DN 34.

2. A Civil Form 3 is attached to this Motion which sets forth the proposed extensions.

3. Pursuant to Local Rule 7.2(c), the parties certify that the party on behalf of whom the motion was filed has been notified.

4. Due to the nature of this Motion, no supporting memorandum of law is required.

Accordingly, the parties request that the Court grant this Motion and extend all deadlines as proposed in the attached Civil Form 3.

Respectfully submitted,

PLAINTIFFS ESJ, LUCKY GIRL BEH,
and ELLIOT SACKOR, SR.

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